



January 24, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

Ex Parte Notice

Re: Modernizing the FCC Form 477 Data Program, WC Docket No. 11-10; Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans, Improvement of Wireless Broadband Subscribership Data, and Development of Data on Interconnected Voice over Internet Protocol (VoIP) Subscribership, WC Docket No. 07-38; Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering, WC Docket No. 08-190; Review of Wireline Competition Bureau Data Practices, WC Docket No. 10-132

Dear Ms. Dortch:

On January 23, the undersigned, from the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), Richard Schadelbauer of the National Telecommunications Cooperative Association (NTCA), Derrick Owens and Eric Keber of the Western Telecommunications Alliance (WTA), Lori Keppler and Chris Hopp of Alpine Communications, William Squires of Blackfoot Communications, Kevin McGuire of Enhanced Telecommunications Corporation, Julie Lobb and William VanderSluis of HickoryTech, Laura Angell, Charity Benton, and Dale Snider of Leaco Rural Telephone, and David Waite of Mid America Computer Corporation participated in a teleconference with Lisa Gelb, Travis Litman, Rodger Woock, and Carol Simpson of the Wireline Competition Bureau, and Susan Singer and Mitali Shah of the Wireless Telecommunications Bureau.

Commission staff reviewed potential changes to FCC Form 477, discussing a proposed client side application that is intended to streamline geocoding and speed tier sorting tasks. The Commission also noted the potential to alter Form 477 to collect broadband deployment data currently provided to states for the purpose of populating the National Broadband Map under the direction of the National Telecommunications and Information Administration. While some records systems that incorporate both billing and deployment/mapping functions may be able to accommodate this proposed functionality, there are concerns that many billing systems only track services to which customers currently subscribe. Many carriers currently submit deployment information to states (or the designated representative for their state) in a variety of formats. Proposed changes to how deployment information is provided could be highly burdensome or impractical, depending on the specific requirements.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via the Electronic Comment Filing System (ECFS).

Sincerely,

/s/ Stephen Pastorkovich

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